

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
(EAST ST. LOUIS)

JESSE WARD,

Plaintiff,

- against -

CONSEQUENCE HOLDINGS, INC.

Defendant.

Docket No. 3:18-cv-01734 (NJR-
MAB)

**NOTICE OF MOTION FOR
DEFAULT JUDGMENT**

PLEASE TAKE NOTICE that, upon this Notice of Motion; the declaration of Richard Liebowitz and exhibits attached thereto, and the pleadings and prior proceedings herein; Plaintiff Jesse Ward will move the Court, before the Honorable Nancy J. Rosenstengel (U.S.D.J.) at the United States District Court for the Southern District of Illinois, 750 Missouri Ave., East St. Louis, IL 62201, Courtroom 3, at a time and place determined by the Court (but not less than 30 days from the effective date of service of this motion) for an Order GRANTING Plaintiff's application for default judgment in the amount of \$5,000.00 in actual damages and/or infringer's profits under 17 U.S.C. § 504(b); \$10,000 in statutory damages under § 1203(c)(3)(B); \$3375.50 in attorneys' fees and \$484.40 costs under 17 U.S.C. § 1203(b)(5); and for such further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that Defendant's opposition papers, if any, must be served within 30 days after personal service of this motion upon Defendant at its last known business address listed below.

PURSUANT TO LOCAL RULE 55.1(b), a proof of service affirming that these motion papers have been mailed to Defendant at its last known business address shall be filed forthwith.

Respectfully Submitted,

LIEBOWITZ LAW FIRM, PLLC

/richardliebowitz/

Richard Liebowitz, Esq.
11 Sunrise Plaza, Ste. 305
Valley Stream, NY 11580

Counsel for Plaintiff Jesse Ward

TO:

Consequence Holdings, Inc.
4609 N. Wolcott Ave.,
Chicago, IL 60640

Defendant